

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

NOTICE OF MARKET-DOMINANT  
PRICE ADJUSTMENT

Docket No. R2013-10R

MOTION OF THE UNITED STATES POSTAL SERVICE  
TO EXTEND COMMENT PERIOD  
(July 17, 2015)

In Order No. 2586, the Commission set forth a multi-factor framework for analyzing whether a change in mail preparation requirements will be considered a rate change subject to 39 U.S.C. § 3622(d), and established a schedule for comment. For the reasons below, the Postal Service hereby moves to extend the deadline for filing initial comments to August 17, 2015, and the deadline for filing reply comments to August 31, 2015.

The establishment of a clear and well defined standard for determining when a change in mailing requirements implicates the price cap is critical to the Postal Service's ability to effectively operate its business, particularly within the framework of a price cap regime. The Postal Service has serious concerns that the multi-factor framework articulated in Order No. 2586 is neither administrable nor consistent with the order of the D.C. Circuit Court of Appeals.<sup>1</sup>

In light of this rulemaking's import, and the undefined framework presented in Order No. 2586, the 19-day initial comment period does not allow time for the Postal

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<sup>1</sup> *U.S. Postal Serv. v. Postal Regulatory Comm'n*, 785 F.3d 740 (D.C. Cir. 2015).

Service to formulate meaningful comments that would be helpful to the Commission in evaluating the framework proposed. Consideration of the proposed framework and its implications for postal pricing and operations requires extensive consultation across internal functional groups. The Postal Service believes that the August 3 deadline does not provide enough time to gather client feedback, conduct the analysis that this matter warrants, and design a workable standard that responds to the court's concerns.

Thus, for the reasons stated above, the Postal Service respectfully requests that the Commission grant this motion to extend the deadline for filing initial comments to August 17, 2015, and the deadline for filing reply comments to August 31, 2015.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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